

EXHIBIT C

EXHIBIT 1

CAUSE NO. 2022-CI-11011

IVAN SMITH

Plaintiff,

v.

**UBER TECHNOLOGIES, INC.;
PORTIER, LLC; RASIER, LLC;
CARLA REYES TREVINO; JOSHUA
ALDANA; RUBEN MALDONADO JR.
and ALBERT ANGEL REYES TREVINO**

Defendants.

IN THE DISTRICT COURT

57TH JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

**PLAINTIFF'S FIFTH SET OF REQUESTS FOR PRODUCTION TO UBER
TECHNOLOGIES INC.**

TO: DEFENDANT UBER TECHNOLOGIES, INC. ("Defendant"), through attorneys of record, Katherine Bell-Moss, Angela Angotti, and Paige Cheung, BOWMAN AND BROOKE LLP, 2901 Via Fortuna Dr., Ste. 500, Austin, Texas 78746.

Plaintiff Ivan Smith serves these Requests for Production on Defendant Uber Technologies, Inc., as allowed by Texas Rule of Civil Procedure 196. Uber Technologies, Inc., must respond to each request separately, fully, in writing, and within 30 days after service.

Pursuant to Texas Rule of Civil Procedure 193.5, these Requests are continuing in nature and require supplementation reasonably promptly after the responding party discovers the necessity for such a response.

Respectfully submitted,

JOHNSON LAW GROUP

By:

/s/ Bret Stanley

Bret Stanley, SBN 24075116
2925 Richmond Avenue, Suite 1700
Houston, TX 77098
Telephone: (210) 404-4878
Facsimile: (210) 610-1134
Bstanley@johnsonlawgroup.com
ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served on all Defendants' Counsel of Record on this 17th Day of April via electronic service.

BOWMAN AND BROOKE LLP
Angela L. Angotti- SBN: 24112893
Katherine E. Bell-Moss- SBN: 00785690
Paige L. Cheung- SBN: 24116193
2901 Via Fortuna Dr., Ste. 500
Austin, Texas 78746
Tel: (512) 874-3804
Fax: (512) 874-3801
Email: Katherine.bell-moss@bowmanandbrooke.com;
angela.angotti@bowmanandbrooke.com;
brianna.leo@bowmanandbrooke.com
paige.cheung@bowmanandbrooke.com;
sara.margo@bowmanandbrooke.com;
jamie.giron@bowmanandbrooke.com

**Attorney for Uber Technologies, Inc, Portier, LLC
d/b/a Uber Eats and Rasier, LLC**

GOLDMAN & PETERSON, PLLC
Larry J. Goldman- SBN: 08093450
Michael F. Aguilar – SBN: 24117936
10100 Reunion Place, Suite 800
San Antonio, Texas 78216
Tel: (210) 340-9800
Fax: (210) 340-9888
Email: larry@ljglaw.com;
michael@ljglaw.com

Service Email: mail@ljglaw.com

Attorney for Defendant Carla Reyes Trevino & Ruben Maldonado Jr.

DORSETT, JOHNSON & SWIFT, LLP
C. Roberts Dorsett, Jr. – SBN: 24029524
Jessica A. Putonti- SBN: 24041295
Abigail Carrier- SBN: 24116170
3503 Wild cherry Dr., Bldg. 6
Austin, Texas 78738
Tel: (512) 600-4365
Fax: (512) 266-3655
Email: acarrier@dorsettjohnson.com
Service Email: eservice@dorsettjohnson.com
Attorney for Defendant Joshua Aldana

HANNA & PLAUT, L.L.P.
David L. Plaut
State Bar No. 16066030
Eva M. C. DeLeon
State Bar No. 24074774
211 East Seventh Street, Suite 600
Austin, Texas 78701
Telephone: (512) 472-7700
Facsimile: (512) 472-0205
Email: dplaut@hannaplaут.com;
edeleon@hannaplaут.com;
sflores@hannaplaут.com
Attorneys For Defendant Albert Angel Reyes Trevino

/s/ Bret Stanley

64. All photographs, surveillance, video recordings, and/or audio recordings that captured any part of the Subject Incident or Subject delivery.
65. Documents reflecting the time, date, and contents of all User Interactions by Joshua Aldana (UUID [REDACTED]) related to the Subject Incident. (This includes but is not limited to delivery acceptance, trip started, trip ended, any in-app messaging, responses to Telematic Triggers, and any other inputs).
66. All Documents provided to Law Enforcement that relate to the Subject Incident in Uber's possession.
67. All e-mails, Exact Target Messages, Zendesk messages, Bliss Messages, text messages and/or any type of electronic message sent to the Driver from January 1, 2022 to Present.
68. All Materials reflecting Uber's Investigation of the Subject Incident, including the complete, up-to-date Ticket and Ticket-Related Documents.
69. All exhibits, documents, or data intended by Uber to be used at Trial in this matter.
[REDACTED]
70. Produce documents that indicate Uber's system flagged Joshua Aldana (UUID [REDACTED]) as making [REDACTED] deliveries.

71.

WITHDRAWN

